

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
-Alexandria Division-

AWP, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:16-cv-332 (TSE/MSN)
)	
SJK SERVICES, LLC)	
DAVID SAMUEL RICE)	
KEITH FRANCIS DOWLING)	
SHAWN WATKINS)	
)	
Defendants,)	

MOTION TO DISMISS

COME NOW Defendants SJK Services, LLC (“SJK”) and Keith Francis Dowling (“Dowling”), by counsel, and move to dismiss Counts III, Count IV, Count V and Count VI of the Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for the reason stated in the Brief In Support of Motion to Dismiss Filed by SJK Services, LLC and Keith Francis Dowling.

Respectfully submitted,

/s/ *James M. Stewart, Jr.*

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2016, I filed the foregoing MOTION TO DISMISS with the Court's electronic filing system, which will effect notice on counsel of record:

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I further certify that on the 25th day of May, 2016, I mailed, with postage prepaid, the foregoing BRIEF IN SUPPORT OF MOTION TO DISMISS FILED BY DEFENDANTS SJK SERVICES, LLC AND KEITH FRANCIS DOWLING to the person(s) listed below:

Shawn Watkins
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/s/ James M. Stewart, Jr.
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